

## Annual CPNI Compliance Certificate

**February 2, 2012**

The undersigned David Collard is Chief Financial Officer of Thames Valley Communications, a division of Groton Utilities, and provides this Certification of CPNI Compliance for 2011 in accord with 47 CFR 64.2009(e).

Our Company has established operating procedures that are adequate to ensure its compliance with the rules in Title 47 – Telecommunications, sections 64.2001 through 64.2009.

Furthermore I am certifying that I have personal knowledge of these procedures, that our Company's personnel are trained on these procedures, and that these procedures are in fact ensuring that our Company is in compliance with the rules in Title 47 – Telecommunications, sections 64.2001 through 64.2009.



David Collard  
CFO  
Thames Valley Communications